

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

LORDSTOWN MOTORS CORP., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831-MFW

(Jointly Administered)

**Related Docket No. 705, 774**

**CERTIFICATION OF COUNSEL REGARDING FIRST INTERIM APPLICATION OF  
TROUTMAN PEPPER HAMILTON SANDERS LLP, AS COUNSEL FOR THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR THE PERIOD FROM  
JULY 17, 2023 THROUGH AND INCLUDING SEPTEMBER 30, 2023**

The Official Committee of Unsecured Creditors (the “Committee”) to the above-captioned debtors and debtors in possession (the “Debtors”), by and through its undersigned counsel, hereby certifies as follows:

1. On November 14, 2023, the Committee filed its *First Interim Application of Troutman Pepper Hamilton Sanders LLP, as Counsel for The Official Committee of Unsecured Creditors for The Period From July 17, 2023 Through and Including September 30, 2023* [Docket No. 705] (the “Interim Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”). The notice filed with the Interim Application established a deadline of December 4, 2023, at 4:00 p.m. (ET) to respond to the Interim Application (the “Response Deadline”). A hearing on the Interim Application was originally scheduled for December 11, 2023 at 2:00 p.m. (ET).

2. On December 5, 2023, the Committee filed its *Certificate of No Objection Regarding First Interim Application of Troutman Pepper Hamilton Sanders LLP as Counsel for*

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

*the Official Committee of Unsecured Creditors for the Period from July 17, 2023 Through and Including September 30, 2023* [Docket No. 774] (the “CNO”).

3. On December 7, 2023, counsel to the Debtors filed the *Certification of Counsel with Respect to First Omnibus Order Awarding Interim Allowance of Compensation for Services Rendered and for Reimbursement of Expenses* [Docket No. 788]. The numbers identified in the Interim Application were included in Debtors’ proposed omnibus order.

4. At the Court’s request, the Committee hereby submits a separate proposed form of order, which is attached hereto as **Exhibit A**, approving the Interim Application (the “Order”). A chambers copy of this Certification of Counsel and proposed Order will be delivered to the Honorable Brendan L. Shannon.

WHEREFORE, the Committee respectfully requests that the Court enter the Order at the Court’s earliest convenience.

*[Remainder of page left intentionally blank]*

Dated: December 11, 2023  
Wilmington, Delaware

Respectfully submitted,

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/s/ Tori L. Remington

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